

# **EXHIBIT Q**

## **Joshua P. Graham**

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**From:** Joshua P. Graham  
**Sent:** Friday, February 26, 2010 2:32 PM  
**To:** 'Hynes, Eleanor M.'  
**Cc:** Daniel McDonald  
**Subject:** RE: ePlus v. Lawson - Supplements to Interrogatory Responses

Dear Eleanor,

Lawson notified ePlus that the responses to Interrogatory Nos. 19 and 20 are deficient on February 1. By contrast, ePlus only yesterday raised issues with Lawson's non-infringement contentions. Lawson has had no time to consider ePlus's position. Under the circumstances, it is inappropriate to require Lawson to supplement its non-infringement contention as a condition to ePlus supplementing its responses to Interrogatory Nos. 19 and 20.

Lawson is willing to discuss its non-infringement contentions with ePlus sometime next week. However, the issues with ePlus's responses to Interrogatory Nos. 19 and 20 have been pending for nearly a month and must be dealt with first. Unless ePlus unconditionally agrees by 5pm EST today to supplement its responses to Interrogatory Nos. 19 and 20 by March 11, 2010, Lawson will file with the court today a motion to compel supplemental responses from ePlus.

Josh

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**From:** Hynes, Eleanor M. [mailto:[EHynes@goodwinprocter.com](mailto:EHynes@goodwinprocter.com)]  
**Sent:** Friday, February 26, 2010 11:58 AM  
**To:** Joshua P. Graham  
**Subject:** ePlus v. Lawson - Supplements to Interrogatory Responses

Dear Josh:

I write to follow-up to your conversation earlier today with Michael Strapp and Jimmy Clements regarding supplementing interrogatory responses. ePlus will agree to supplement its response to Lawson's

invalidity contentions (with respect to the alleged prior-art references included in the claim charts of Lawson's Statement of Invalidity Defenses) on March 11, 2010, provided that Lawson agrees to supplement to its non-infringement contentions on March 11th to address and cure the deficiencies set forth in, e.g., Michael Strapp's letter of February 25th. Please let me know if Lawson will agree to this proposed exchange on March 11th.

Eleanor

Eleanor Hynes Yost  
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